## REMARKS

Claims 1-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Park et al. (US 6,335,276 B1) in view of Kim (US 6,225,130 B1) and Park et al. (US 6,287,899 B1).

Applicants respectfully traverse the rejection as being based upon a combination of references that neither teach nor suggest the novel combination of features recited in independent claim 1, and hence dependent claims 2-17.

The Office Action recognizes that Park et al. ('276) does not disclose all of the features recited by independent claim 1. Kim is relied upon for allegedly teaching "a storage capacitor formed in the middle of the pixel area with the pixel electrode contacting the storage capacitor electrode through contact holes in the insulation layer" to provide motivation to modify Park et al. ('276). Moreover, the Office Action asserts that it would have been obvious "to form the storage capacitor of Kim (U.S. 6,255,130) in the display of Park et al. (U.S. 6,335,276) because it is **a functionally equivalent alternative** to the storage capacitor disclosed by Park et al. (U.S. 6,335,276)." Applicants respectfully disagree.

M.P.E.P. § 2143.01 instructs that "[o]bviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art." Accordingly, since Kim does not provide **any** teaching, suggestion, or motivation to combine or modify the teachings of Park et al. ('276), Applicants respectfully assert that the Office Action has not established a *prima facie* case of obviousness. Applicants further assert that dependent claims 2-17 are allowable at least because of their dependence from independent claim 1.

Applicants further assert that the Office Action does not rely on Park et al. ('899) to provide motivation to modify Park et al. ('276) and/or Kim. Moreover, Applicants respectfully assert that Park et al. ('899) cannot provide proper motivation to modify Park et al. ('276) and/or Kim.

Furthermore, Applicants respectfully submit that dependent claims 2-17 are allowable for all of the reasons discussed above with regard to independent claim 1, from which they depend, as well as the individual features each of dependent claims 2-17 recite.

# # #

For the above reasons, Applicants respectfully assert that the rejection under 35 U.S.C. § 103(a) should be withdrawn because Park et al. ('276), Kim, and/or Park et al. ('899) whether taken individually or in combination, neither teach nor suggest the novel combination of features clearly recited in independent claim 1, and hence dependent claims 2-17.

## Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner believe that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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